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Attorneys for Plaintiffs

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
EUGENE DIVISION

NICHOLAS JAMES MCGUFFIN, as an
individual and as guardian *ad litem*, on behalf
of S.M., a minor,
Plaintiffs,

Civil No. 6:20-cv-01163-MK
(Lead Case)

v.

MARK DANNELS, PAT DOWNING,
SUSAN HORMANN, MARY KRINGS,
KRIS KARCHER, SHELLY MCINNES,
RAYMOND MCNEELY, KIP OSWALD,
MICHAEL REAVES, JOHN RIDDLE, SEAN
SANBORN, ERIC SCHWENNINGER,
RICHARD WALTER, CHRIS WEBLEY,
ANTHONY WETMORE, KATHY WILCOX,
CRAIG ZANNI, DAVID ZAVALA, JOEL D.
SHAPIRO AS ADMINISTRATOR OF THE
ESTATE OF DAVID E. HALL, VIDOCQ
SOCIETY, CITY OF COQUILLE, CITY OF
COOS BAY, and COOS COUNTY,
Defendants.

PLAINTIFFS' MOTION TO REQUEST
REDACTION OF OFFICIAL COURT
TRANSCRIPT OF PROCEEDING
(DKT. 262 (LEAD CASE) AND DKT.
150 (TRAILING CASE))

VIDOCQ SOCIETY,
Cross-Claimant,

v.

MARK DANNELES, PAT DOWNING,
SUSAN HORMANN, MARY KRINGS,
KRIS KARCHER, SHELLY MCINNES,
RAYMOND MCNEELY, KIP OSWALD,
MICHAEL REAVES, JOHN RIDDLE, SEAN
SANBORN, ERIC SCHWENNINGER,
RICHARD WALTER, CHRIS WEBLEY,
ANTHONY WETMORE, KATHY WILCOX,
CRAIG ZANNI, DAVID ZAVALA, JOEL D.
SHAPIRO AS ADMINISTRATOR OF THE
ESTATE OF DAVID E. HALL, VIDOCQ
SOCIETY, CITY OF COQUILLE, CITY OF
COOS BAY, and COOS COUNTY
Cross-Defendants.

NICHOLAS JAMES MCGUFFIN, as an
individual and as guardian *ad litem*, on behalf
of S.M., a minor,
Plaintiffs,

Civil Case No. 3:21-cv-01719-MK
(Trailing Case)

v.

OREGON STATE POLICE,
Defendant.

I. RELIEF REQUESTED

Pursuant to the Stipulated Protective Order [Dkt. No. 181] and the Court's "Policy and Procedures for the Electronic Filing of Transcripts," Plaintiffs Nicholas McGuffin and S.M. request the Court order the redaction of certain pages of the transcript from a hearing on August 27, 2024 [Dkt. No. 262 in the lead case and Dkt. No. 150 in the trailing case]. Specifically, Plaintiffs request the Court order the redaction of page 107, line 11 through page 118, line 23.

II. POINTS AND AUTHORITIES

On June 26, 2024, the Municipal Defendants filed a motion to compel certain information. [Dkt. Nos. 240 and 241] The Municipal Defendants filed the motion and supporting declaration under seal to protect certain information designated confidential under the Stipulated Protective Order.

On July 10, 2024, Plaintiffs filed their response to the motion to compel. [Dkt. Nos. 250 and 251] Plaintiffs filed the response and supporting declaration under seal to, likewise, protect certain information designated confidential under the Stipulated Protective Order.

The Court held a hearing on the motion, as well as other issues, on August 27, 2024. [Dkt. No. 255] During that hearing, the Court and the parties discussed the confidential information at issue in the motion and response.

On October 29, 2024, the Court Reporter notified the parties that the official court transcript of the proceedings was filed on ECF. [Dkt. No. 262] The Court Reporter notified the parties that the deadline to file a notice of intent to redact is November 5, 2024.

On November 4, 2024, Plaintiffs filed their “Notice of Intent to Request Redaction” pursuant to the Court’s “Policy and Procedures for the Electronic Filing of Transcripts.”

Plaintiffs hereby request the Court redact the pages of the transcript that address the information designated confidential under the Stipulated Protective Order. Specifically, Plaintiffs request the Court order the redaction of page 107, line 11 through page 118, line 23.

DATED: November 4, 2024

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CERTIFICATE OF SERVICE

I hereby certify that on November 4, 2024, the foregoing PLAINTIFFS' MOTION TO REQUEST REDACTION OF OFFICIAL COURT TRANSCRIPT OF PROCEEDING was served on the following parties at the following address by sending to them a true copy thereof via the method indicated below:

Robert E. Franz, Jr. Sarah R. Henderson Law Office of Robert E. Franz, Jr. PO Box 62 Springfield, OR 97477 rfranz@franzlaw.comcastbiz.net shenderson@franzlaw.comcastbiz.net <i>Attorneys for Defendants</i> <i>City of Coquille, City of Coos Bay, Coos County, Craig Zanni, Chris Webley, Eric Schwenninger, Sean Sanborn, Ray McNeely, Kris Karcher, Pat Downing, Mark Dannels, Kip Oswald, Michael Reaves, David Zavala, Anthony Wetmore, Shelly McInnes</i>	Jesse B. Davis Todd Marshall Kristen Hoffmeyer Oregon Department of Justice 100 SW Market Street Portland, OR 97201 todd.marshall@doj.state.or.us jesse.b.davis@doj.state.or.us kristen.hoffmeyer@doj.state.or.us <i>Attorneys for Defendants Oregon State Police, John Riddle, Susan Hormann, Mary Krings, Kathy Wilcox</i>
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☒ by electronic means through the Court's ECF System on the date set forth above.

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